05-015-1

July 14, 2005

Docket No. 05-015-1,
Regulatory Analysis and Development, PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale MD 20737-1238

Re: Docket No. 05-015-1

Attn: Mr. Neil Hammerschmidt

After careful consideration, the US Trout Farmers Association does not support inclusion of trout culture or other aquaculture as part of the proposed National Animal Identification System at this time. We have determined that this system is not currently in the best interests of our members or the public due to the very limited potential for benefit in terms of risk reduction, and excessive economic burden that would be placed on our industry. Several key differences exist between aquatic animal husbandry and terrestrial animal production that would limit the relative benefits and greatly increase the costs imposed on aquaculture producers if included in the system currently proposed. Our rationale is based on the following conclusions and problems inherent in the proposed system:

1) A lack of zoonotic diseases associated with the production of our primary species, rainbow trout, a paucity of zoonotic diseases in other finfish aquaculture, and an existing program for managing shellfish aquaculture, the National Shellfish Sanitation Program, make the proposed NAIS redundant and very minimal in terms of prospective benefit relative to costs. The benefits to public health in the US would be negligible.

2) The relatively small size of the aquaculture industry, especially the trout industry, greatly limits the potential social and economic impact of any disease outbreak. A national animal identification program cannot be justified on the basis of such limited risk. The US trout industry consists primarily of small, family-operated businesses, with sales under $130,000 per year. However, over 85% of commercial trout production in the US occurs on the largest 20% of the farms (108 of 561), many of which are located in one state (Idaho). A national program of animal identification/tracking is unjustified for this industry.

3) Trout and other fish produced by domestic aquaculture must compete in the marketplace not only with fish cultured in foreign countries, but also with fish harvested from wild stocks of both foreign and domestic origin. This is in stark contrast to commodities such as beef, pork, or poultry. No equivalent 'birth to processor' tracing system can be implemented for capture fisheries, and it is highly unlikely such a system will be possible for foreign aquaculture producers. Considering the benefits to the US trout producers and to the public would be extremely limited from applying the NAIS to aquaculture, the cost of compliance with a voluntary or mandatory animal identification system would put domestically produced aquaculture products at considerable economic

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disadvantage. As determined in the recent economic evaluation for possible national effluent limitation guidelines development, such costs cannot be passed through to consumers of aquaculture products due to marketing constraints.

4) The greatest risks for exotic disease transmission to the trout industry are not addressed by the proposed NAIS. Potentially the greatest threat to aquatic animal health in the US comes from exotic diseases, primarily from imports of ornamental fish species in which disease transmission is essentially unregulated. The proposed NAIS program states "These standards will apply to all animals within the represented industries regardless of their intended use as seedstock, commercial, pets or other personal uses." However, no details are provided as to the mechanism for identifying and tracking fish used as pets (or food), and it is extremely difficult to envision a viable system for this task. Since very few live trout and only a small number of eggs are imported into the US, the risk from exotic disease transmission via live trout is very, very low. The economic burden of the proposed NAIS to the domestic trout industry and other aquaculture far exceeds the potential benefit in terms of actual risk reduction considering that the greatest risks are not addressed within this framework.

5) Certainly there is no traceback advantage to individual fish identification with relatively small animals such as trout. Additionally, current management strategies for optimizing production on trout farms is based primarily on optimizing space and feed utilization. Such strategies rely on the ability of management to commingle fish from different lots in order to maintain similarly sized animals within production units. Since trout are produced in flowing water systems and the water within a production farm may be allocated or mixed dynamically, even traceback to individual lots on a farm offers limited utility for isolating animals relative to exposure to pathogens on a farm. In effect, the utility of traceback relative to disease risk/exposure becomes limited to traceback of trout to a particular farm. The aforementioned production practices have proven to be successful in the trout industry, but do not fit well into the proposed NAIS scheme. If justified economically, for public health concerns, or demanded by consumers, the potential marketing benefits for verification of production source can be achieved through current systems in place through existing processor-producer relationships.

Our recommendation is that aquaculture not be included in the NAIS currently being developed. Several additional issues not discussed above, including issues of confidentiality and increased liability have not yet been suitably resolved in the proposed program and also influence our position. We recommend that a task force be developed specifically to consider traceability issues regarding aquaculture products due to the unique and diverse nature of aquaculture production systems. Such a group should consist primarily of representatives of aquaculture producer organizations such as USTFA and similar producer groups as well as umbrella organizations such as NAA and the US Aquaculture Society.

Sincerely,

/s/ *Robert Nahodil*

Robert Nahodil
President